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Attorney for Defendant  
HEATHER ROMOSER

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Heather Romoser,

Defendant.

No. 2:21-cr-00110-DAD-5

**STIPULATION AND ORDER FOR  
MODIFICATION OF CONDITIONS OF  
PRETRIAL RELEASE**

Defendant, HEATHER ROMOSER, by and through her counsel of record, TONI WHITE, and the GOVERNMENT hereby stipulate as follows:

1. On January 26, 2022, Ms. Romoser was ordered released on bond with special conditions including a 90 day residential drug treatment program at Wellspace Residential Drug Treatment program. (ECF DOC #79).
2. Special condition numbers 16, 17 and 18 of Ms. Romoser's special conditions of release (ECF DOC #80) subjected Ms. Romoser to location monitoring upon her release from Wellspace.
3. Ms. Romoser is being supervised in Idaho by Pretrial Services. Both her pretrial officer in Idaho, Joel Osborne, and Sacramento, Darryl Walker, are amenable to the removal of Ms. Romoser's location monitoring.

4. Pretrial services officer Osborne reports as follows:

She [Ms. Romoser] has been in full compliance since her placement on pretrial supervision approximately six months ago. She abides by her curfew, in fact, she is usually home several hours before her curfew. Most of the time she is home with her parents when she is not at work. She is employed full-time and is enrolled in treatment. According to her counselor, she is consistent with attendance and is engaged. She has consistently attended drug testing without submitting any positive tests.

We like to prioritize location monitoring technology and utilize it for individuals who present significant risk factors, as location monitoring cases are very time consuming for the officer. Currently, she is not exhibiting any risk factors, such as criminal activity, drug use, or flight. It's not necessarily interfering with anything in her life, other than it's expensive and uncomfortable. Yes, in a way it is a reward for her compliance, but I believe the potential removal of the device has given her incentive to do well.

5. Aaron Pennekamp, counsel for the Government, has been advised of the proposed removal of location monitoring and has no objection.

By this stipulation, Ms. Romoser now moves to have special conditions #16, 17 and 18 removed.

IT IS SO STIPULATED.

Dated: December 6, 2022

McGregor Scott  
United States Attorney

By: /s/ Aaron Pennekamp  
Aaron Pennekamp  
Assistant U.S. Attorney

For the United States

Dated: December 6, 2022


By: /s/ Toni White  
TONI WHITE

For Defendant Heather Romoser

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: December 11, 2022



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DEBORAH BARNES  
UNITED STATES MAGISTRATE JUDGE